



**IN THE CIRCUIT COURT OF
MONTGOMERY COUNTY, ALABAMA**

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|------------------------------------|---|---------------------------|
| STATE OF ALABAMA, |) | |
| |) | |
| |) | |
| vs. |) | |
| |) | Civil Action No. 2005-219 |
| |) | |
| ABBOTT LABORATORIES, INC., et al., |) | |
| |) | |
| |) | |
| |) | |

**MOTION OF DEFENDANT ORGANON PHARMACEUTICALS USA INC. LLC FOR
SEVERANCE OR, IN THE ALTERNATIVE, FOR SEPARATE TRIAL.**

COMES NOW Defendant Organon Pharmaceuticals USA Inc. LLC ("Organon"), and moves the Court, pursuant to Rules 20 and 21, Alabama Rules of Civil Procedure, to sever the action brought herein by Plaintiff against Organon from the separate claims and actions against all other Defendants.

In the alternative, Organon moves the Court, pursuant to Rule 20(b), Alabama Rules of Civil Procedure, for a separate trial of all claims and issues as to Organon from the claims made against other Defendants in this action.

In support of this motion, Organon adopts and joins in the grounds, arguments and legal authorities argued and cited by Defendant Aventis Pharmaceuticals, Inc. and other Defendants herein, and further adopts by reference to the extent relevant to Organon the facts set forth in the declarations and other filings or submissions by other Defendants in support of their separate Motions for Severance or Separate Trials.

Dated: September 28, 2006
Mobile, Alabama

Respectfully submitted,

/s/ Archibald T. Reeves, IV

Archibald T. Reeves, IV

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 28th day of September, 2006, electronically served a true and correct copy of the foregoing motion on counsel of record by transmission to LNFS, pursuant to Case Management Order No. 2.

/s/ Archibald T. Reeves, IV

Of Counsel